

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CITILINE HOLDINGS, INC., Individually : Civil Action No. 1:08-cv-03612-RWS
and On Behalf of All Others Similarly Situated, :
Plaintiff, :
vs. :
ISTAR FINANCIAL INC., et al., :
Defendants. :
DENNIS CHRISTENSON, Individually and : Civil Action No. 1:08-cv-03879-RWS
On Behalf of All Others Similarly Situated, :
Plaintiff, :
vs. :
ISTAR FINANCIAL INC., et al., :
Defendants.

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NOTICE OF MOTION FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFFS
AND FOR APPROVAL OF SELECTION OF LEAD COUNSEL

PLEASE TAKE NOTICE that Institutional Investor Plumbers' Union Local No. 12 Pension Fund ("Plumbers Local No. 12") and class member Citiline Holdings, Inc. ("Citiline") will hereby move this Court, on a date and at such time as may be designated by the Court, for an Order (attached hereto as Exhibit A): (i) consolidating the Actions; (ii) appointing Plumbers Local No. 12 and Citiline as Lead Plaintiffs; (iii) approving Plumbers Local No. 12 and Citiline's selection of the law firms of Coughlin Stoia Geller Rudman & Robbins LLP and Abraham Fruchter & Twersky LLP to serve as Lead Counsel; and (iv) granting such other and further relief as the Court may deem just and proper. In support of this Motion, Plumbers Local No. 12 and Citiline submit herewith a Memorandum of Law and Declaration of Mario Alba Jr. dated June 13, 2008.

DATED: June 13, 2008

COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
SAMUEL H. RUDMAN
DAVID A. ROSENFELD
MARIO ALBA JR.

/s/ Mario Alba Jr.
MARIO ALBA JR.

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[Proposed] Co-Lead Counsel for Plaintiffs

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CERTIFICATE OF SERVICE

I, Mario Alba Jr., hereby certify that on June 13, 2008, I caused a true and correct copy of the attached:

Notice Of Motion For Consolidation, Appointment As Lead Plaintiffs And For Approval Of Selection Of Lead Counsel;

Memorandum In Support Of The Motion Of Plumbers Local No. 12 And Citiline For Consolidation, Appointment As Lead Plaintiffs And For Approval Of Selection Of Lead Counsel; and

Declaration Of Mario Alba Jr. In Support Of The Motion Of Plumbers Local No. 12 And Citiline For Consolidation, Appointment As Lead Plaintiffs And For Approval Of Selection Of Lead Counsel

to be served: (i) electronically on all counsel registered for electronic service for this case; and (ii) by first-class mail to any additional counsel on the attached service list.

/s/ Mario Alba Jr.

Mario Alba Jr.

iSTAR FINANCIAL

Service List - 6/13/2008 (08-0083)

Page 1 of 1

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[PROPOSED] ORDER CONSOLIDATING THE ACTIONS, APPOINTING LEAD
PLAINTIFFS AND APPROVING SELECTION OF LEAD COUNSEL

Having considered the motion of Plumbers' Union Local No. 12 Pension Fund ("Plumbers Local No. 12") and Citiline Holdings, Inc. ("Citiline") for Consolidation, Appointment as Lead Plaintiffs and Approval of Selection of Lead Counsel and the Memorandum of Law and Declaration of Mario Alba Jr., in support thereof, and good cause appearing therefor:

1. The Actions are hereby consolidated;
2. Plumbers Local No. 12 and Citiline are hereby appointed Lead Plaintiffs for the Class pursuant to Section 27 of the Securities Act of 1933; and
3. The law firms of Coughlin Stoia Geller Rudman & Robbins LLP and Abraham Fruchter & Twersky LLP are hereby appointed Lead Counsel.

IT IS SO ORDERED.

DATED: _____

THE HONORABLE ROBERT W. SWEET
UNITED STATES DISTRICT JUDGE

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